

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 691**

**CERTIFICATION OF NO OBJECTION REGARDING THIRD MONTHLY FEE  
APPLICATION OF BAKER & HOSTETLER LLP, AS SPECIAL LITIGATION  
AND CORPORATE COUNSEL FOR THE DEBTORS, FOR ALLOWANCE  
OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED  
FOR THE PERIOD SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

The undersigned hereby certifies that, as of the date hereof, they have received no answer, objection, or other responsive pleading with respect to the third monthly fee application for compensation and reimbursement of expenses (the “**Monthly Application**”) of Baker & Hostetler LLP (“**Applicant**”) listed on Exhibit A attached hereto. The Monthly Application was filed with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on November 14, 2023. The undersigned further certifies that they have reviewed the Court’s docket in this case and no answer, objection or other responsive pleading to the Monthly Application appears thereon. Pursuant to the Notice of Fee Application filed with the Monthly Application, objections to the Monthly Application were to be filed and served no later than **December 4, 2023 at 4:00 p.m. (ET)**. The Monthly Application was filed and served in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter*

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

*11 Professionals and Committee Members*, entered July 25, 2023 [D.I. 181] (the “**Interim Compensation Order**”).

Consequently, pursuant to the Interim Compensation Order, the debtors and debtors in possession in the above-captioned cases are authorized to pay Applicant eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the Monthly Application upon the filing of this certification without the need for a further order of the Court. A summary of the fees and expenses sought by Applicant is annexed hereto as **Exhibit A**.

Dated: December 6, 2023  
Wilmington, Delaware

Respectfully submitted,

/s/ Morgan L. Patterson

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	<p><i>Co-Counsel to Debtors and Debtors in Possession</i></p>

**EXHIBIT A**

Professional Fees and Expenses  
Monthly Fee Application

Applicant	Fee Application Period, Filing Date, D.I.	Total Fees Requested	Total Expenses Requested	Objection Deadline:	Amount of Fees Authorized to be Paid @ 80%	Amount of Expenses Authorized to be Paid at 100%	Amount of Holdback Fees Requested
Baker & Hostetler LLP	9/1/23 – 9/30/23 D.I. 691	\$56,877.30	\$0.00	12/4/23	\$45,501.84	\$0.00	\$11,375.46